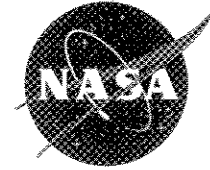


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 10, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

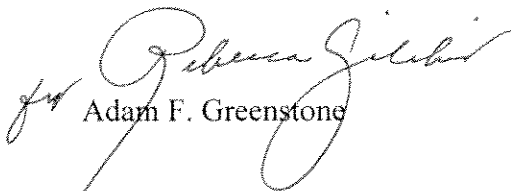
FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-129
Pre-Launch Reception hosted by Jacobs on November 15, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by Jacobs at the Hilton Hotel Atlantis Grill Restaurant, Cocoa Beach, in Florida, on November 15, 2009, from 8:00 p.m.-10:30 p.m. This event will advocate each of our Nations Space programs and celebrate the benefits that this industry brings to our nation with our colleagues in the public, academia, supplier network, industry as well as our elected officials.

This event will be a widely-attended gathering of approximately 300 representatives of government, the aerospace industry and the community. Food and refreshments will be served at a cost of approximately \$15.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above-mentioned reception is in the interest of the agency because it will further agency programs and operations. Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect Jacobs, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the food they and any accompanying guest consume at the reception for themselves and their invited guests.


Adam F. Greenstone